

AR201-13116

**American
Chemistry
Council**
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July 5, 2001

Sent Via Hand Delivery

Mr. Oscar Hernandez
US EPA Headquarters
401 M Street, SW
East Tower, 104A
Washington, DC 20460

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Subject: High Production Volume (HPV) Chemical Challenge Program – Test Plan Submission

Dear Mr. Hernandez:

The American Chemistry Council Higher Olefins Panel¹ (Panel) submits for review and public comment its test plan, as well as related robust summaries, for the “Higher Olefins” category of chemicals under the Environmental Protection Agency’s High Production Volume (HPV) Chemical Challenge Program. The Panel understands that there will be a 120-day review period for the test plan and that all comments generated by or provided to EPA will be forwarded to the Panel for consideration.

This test plan addresses alpha and internal aliphatic olefins, linear and branched, which are within the HPV Challenge Program. The members of the category fall within the ranges of even carbon numbers for C6 – C54 alpha olefins, C13 alpha olefins, and C6 – C18 internal olefins (odd and even carbon numbers). The C6 – C14 even numbered linear alpha olefins are sponsored under the SIDS program. The Panel has committed to sponsor the C6, C7, C8, C9, and C12 aliphatic linear and branched internal olefins and the C16 and C18 aliphatic linear alpha olefins in the ICCA HPV program. Thus, the Panel believes these chemical categories meet the EPA definition of a chemical category and will test them in accordance with the attached test plan.

Briefly, the test plan for the higher olefins category includes the following tests:

- Alga toxicity (OECD 201)
- Acute Daphnid toxicity (OECD 202)
- Oral Reproductive/developmental toxicity screen (OECD 421)

As the Panel developed this test plan, the Panel considered carefully and tried to limit how many animals might be required for tests included in the proposed plan and conditions to which the animals might be exposed. As a result, the Panel believes that the concerns of some non-governmental organizations about animal welfare have been fully considered and that use of animals in this proposed test plan has been minimized.

¹ The members of the Higher Olefins Panel are BP, Chevron Phillips Chemical Company, CONDEA Vista Company, ExxonMobil Chemical Company, Sasol, Shell Chemical Company, Shell Chemicals, Ltd., Spolana a.s. Neratovice, and Sunoco, Inc.



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Higher Olefins Panel Submission of Test Plan to EPA

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Thank you in advance for your attention to this matter. If you have any questions regarding the test plan or the robust summaries, or Panel's activities associated with the Challenge Program, please contact me at 703-741-5616 (Phone), 703-741-6091 (Fax) or Doug_Anderson@americanchemistry.com (e-mail).

Sincerely,

W. D. (Doug) Anderson
Manager, Higher Olefins Panel

CC: C. Auer, EPA
Higher Olefins Panel